

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

/

**UNSWORN STATEMENT UNDER PENALTY OF PERJURY OF
PLAINTIFF JANE DOE PURSUANT TO 28 U.S.C. § 1746**

I, Jane Doe, declare as follows:

1. I am over 18 years of age, and competent to provide testimony under oath.
2. I have personal knowledge of the matters herein and, if called to testify at the trial of this matter, I could competently testify as to the facts contained in this affidavit.
3. I am currently pursuing a degree in an out of state school. My school is approximately a 2 ½ to 3 hour driving distance from the closest airport.
4. Between September 22 and September 30, I spoke with my attorney, Carlos A. Garcia Perez, numerous times regarding my available dates to be deposed in this matter. I informed him that based on my current class schedule at my school, and in order not to miss classes, I could only be available for an all-day deposition remotely on October 24, November 7 or 14. I also told him that based on my class schedule, and in order not to miss classes, I could travel to Miami and be available for my deposition in-person on November 21, 24 or 25.
5. I provided these dates in good faith and in an attempt to facilitate the scheduling of my deposition, without undue burden and without jeopardizing my class standing. My

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school's handbook states that failure to attend classes may result in being dropped from the course, a grade reduction or failure.

6. I told my counsel that I could not be available for a deposition in Miami on November 3, because I had a full day of classes scheduled. Furthermore, due to the location of my school, it requires a full day of travel to get to Miami and another full day of travel to return to school. For this reason, and based on my class schedule, I was not available or able to appear for my deposition in Miami on November 3rd since it would have necessitated missing three full days of classes. Additionally, round-trip flights to Miami average \$900.00.

7. Based on my class schedule, I planned to be in Miami for a week over the Thanksgiving break. Thus to reduce the burden of costs and the burden of disrupting my studies and class attendance, I provided the date of November 21 for my deposition in Miami. When I was told by Mr. Garcia that Defendant's counsel was not available on that day, I then provided the additional dates of November 24, or 25.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and understanding, the foregoing is true and correct.

Executed in Miami, Florida, this 12th day of November, 2025.

Jane Doe

Jane Doe